
IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

In Re:)	Case No.: 18-06461
Anna Ihana)	
)	Chapter 13
)	
Debtor(s))	Judge: Timothy A. Barnes

NOTICE OF MOTION

TO: Anna Ihana, 6110 N Springfield Ave. Chicago, IL 60659 *via mail*

Trustee Marilyn Marshall, 224 S. Michigan Ave., #800, Chicago, IL 60604 *via ECF clerk's electronic delivery system*

U.S. Trustee, 219 S. Dearborn Suite 873, Chicago IL 60604 *via ECF clerk's electronic delivery system*

See attached service list

PLEASE TAKE NOTICE that on **April 11, 2019 at 9:30 a.m.**, I shall appear before the Honorable Timothy Barnes, at the Dirksen Federal Court, 219 S. Dearborn, Courtroom 744, Chicago, Illinois 60604, or any judge presiding and then and there present this **Motion**, a copy of which is attached hereto.

By: /s/ David H. Cutler
David H. Cutler

CERTIFICATE OF SERVICE

I, David H. Cutler, hereby certify that I caused to be served, electronically or through U.S. Mail, a copy of the foregoing Notice and Motion upon the parties named above on March 21, 2019 before the hour of 8:00 p.m. from the office located at 4131 Main Street., Skokie, Illinois 60076.

By: /s/ David H. Cutler
David H. Cutler, esq.
Counsel for Debtor(s):
Cutler & Associates, Ltd.
4131 Main St,
Skokie, IL 60076
Phone: (847) 673-8600

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MOTION TO MODIFY PLAN POST CONFIRMATION

NOW COMES the Debtor, Anna Ihana (hereafter referred to as “the Debtor”), by and through her attorneys, The Law Offices of Cutler & Associates, Ltd., to present this Motion and state as follows:

1. This Court has jurisdiction over this proceeding pursuant to 28 USC 1334 and this is a "core proceeding" under 28 USC 157(b)(2).
2. The Debtor filed for relief under Chapter 13 of the United States Bankruptcy Code on March 6, 2018 and her Plan was confirmed.
3. The Debtor’s confirmation Order provides for a plan payment of \$1,425 for 2 months, then \$1,450 for 8 months and then \$2,025 for 50 months until the end of the plan with unsecured creditors receiving 100% of their unsecured claims.
4. The Debtor has paid in to date \$17,925 to her Chapter 13 plan.
5. The Debtor’s part time home health care income has decreased and she is looking to lower her plan payment by \$250 a month.
6. The Debtor’s creditor claims have come in lower than scheduled and currently her plan will end a few months early.
7. The Debtor is now asking that since her monthly income has decreased and she has less disposable income if her plan payment can be lowered to \$1,775 a month for the

remainder of the plan and her unsecured creditors will still be receiving 100% of their unsecured claims.

8. The Debtor seeks to modify the plan to lower the plan payment to \$1,775 a month for the remainder of the plan commencing with the May 2019 payment.

WHEREFORE, the Debtor respectfully requests that this Court modify the Debtor's Plan Post Confirmation to lower the plan payment to \$1,775 a month for the remainder of the plan commencing with the May 2019 payment and for such further relief that this Court may deem just and proper.

Dated: March 21, 2019

Respectfully Submitted,

By: /s/ David H. Cutler
David H. Cutler, esq.,
Counsel for Debtor(s):
Cutler & Associates, Ltd.
4131 Main St.
Skokie, IL 60076
Phone: (847) 673-8600